

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

Homeshield
Attn: Mr. Dave Franklin
Post Office Box 907, U.S. Route 24 East
Chatsworth, Illinois 60921

Application No.: 81030070

I.D. No.: 105805AAA

Applicant's Designation:

Date Received: April 21, 1999

Subject: Coil Coating Operations

Date Issued: March 1, 2004

Expiration Date: October 14, 2008

Location: U.S. Route 24 East, Chatsworth

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of cold cleaning operations, a coil coating operation controlled by afterburner with natural gas combustion units, a Bi-lamination line with substrate cleaning station, 54 roll formers, floor sweeper, and 8 press metal former units, pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s)

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for volatile organic materials (VOM), 10 tons/year for a single hazardous air pollutant (HAP), and 25 ton/year for totaled HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
 - b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
 - c. This permit supersedes all operating permits for this location.
 - d. This permit is issued based on negligible emissions of volatile organic material (VOM) from 8 press metal former units. For this purpose emissions from each emission source, shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
2. Emissions and operation of the bilamination line, 54 roll formers, adhesive application, and solvent wipe/drip station and floor sweeper including all clean-up operations, shall not exceed the following limits:

<u>Material</u>	<u>Usage and Emissions of</u> <u>Volatile Organic Material</u>		
	<u>(Lb/Hr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Detergent/Glass Cleaner	8	1.0	3.0
Substrate Cleaning Station	8	0.02	0.23
54 Roll Formers (Lubricants & Coolant)	8	5.3	40.0
Adhesive Application & Solvent Wipe/Drip Station	8	0.09	0.92
Floor Sweeper Cleaner	8	0.02	0.15

These limits are based on the representations of maximum annual usage of materials, 100% evaporation of VOM and 35 Ill. Adm. Code 215.301. Compliance with annual limits shall be determined from a running total of 12 months of data.

- 3a. Usage and emissions of VOM from all cold cleaning operations, other than coil coating clean-up, shall not exceed 2.0 tons/year. Usage shall be defined as amount of solvent purchased minus amount of solvent reclaimed and shipped off-site. Compliance with annual limits shall be determined from a running total of 12 months of data.
- b. The Permittee shall comply with all operating requirements of 35 Ill. Adm. Code 215.182 Cold Cleaning Degreasers.
4. At all times, the Permittee shall also, to the extent practicable, maintain and operate the coil coating operation, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions.
5. The coil coating operation is subject to the VOM emission limitations of 35 Ill. Adm. Code Part 215, Subpart F: Coating Operations. Compliance with the requirements of this subpart is achieved due to the use of capture systems and control devices that provide 81 percent reduction in the overall emissions of VOM from the coating lines and the control devices have a 90 percent efficiency pursuant to 35 Ill. Adm. Code 218.205(b).
6. Operations and emissions from coil coating operations, including all clean-up operations, shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>Contents (Lb/Gallon)</u>		
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>VOM</u>	<u>HAPs</u>	<u>Single HAP</u>
Isophorone Group	4,000	40,000	7.23	5.88	3.69
Thinner	350	3,500	9.09	0.75	0.75
Clean-Up Solvent	700	7,000	3.65	0.07	0.07
Other Group	8,000	80,000	7.15	2.50	1.61

<u>T O T A L E M I S S I O N S</u>					
<u>(Tons/Month)</u>			<u>(Tons/Year)</u>		
<u>VOM</u>	<u>HAPs</u>	<u>Single HAP</u>	<u>VOM</u>	<u>HAPs</u>	<u>Single HAP</u>
4.0	2.0	0.7	40	19.1	6.4

These limits are based on maximum operating rate, VOM and HAP contents, and an overall control efficiency of 91.3% for the afterburner as substantiated by recent demonstrations. Compliance with annual limits shall be determined on a monthly basis from the sum of data for current month plus the preceding 11 months.

7. The emissions of hazardous air pollutants as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single hazardous air pollutant or 25 tons per year of any combination of such hazardous air pollutants, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any hazardous air pollutants from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.
- 8a. The afterburner shall be in operation at all times when the associated emission units are in operation and emitting air contaminants.
- b. The afterburner combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test before the coating process is begun. This temperature shall be maintained during the coating process.
- c. The afterburner shall be equipped with a continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor's specifications at all times that the afterburner is in use. This device shall monitor the afterburner combustion chamber temperature.
9. Operation and emissions of all fuel combustion equipment (combined) shall not exceed the following limits:
 - a. Natural Gas Usage: 32 mmscf/month, 314 mmscf/year

<u>Pollutant</u>	<u>Emission Factor (Lb/mmscf)</u>	<u>Emissions (Tons/Mo)</u>	<u>(Tons/Yr)</u>
Nitrogen Oxides (NO _x)	100	1.6	15.7
Carbon Monoxide (CO)	84	1.3	13.2
Volatile Organic Material (VOM)	5.5	0.09	0.9

These limits are based on the maximum operations and standard emission factors given by AP-42. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 months of data.

10. The Permittee shall maintain monthly records of the following items:
 - a. VOM and HAP content of each material used (lb/gallon);
 - b. Usage of each material (tons/month and tons/year or gallons/month and gallons/year);
 - c. Amount of solvent reclaimed and shipped off-site (tons/month and tons/year);

- d. Afterburner monitoring data;
 - e. A log of operating time for the capture system, afterburner, monitoring devices, and the coating lines;
 - f. A maintenance log for the capture system, afterburner, and monitoring devices detailing all routine and non-routine maintenance performed including dates and duration of any outages;
 - g. Emissions of VOM and HAP (individual and total) (tons/month and tons/year).
11. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
12. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedances or violation and efforts to reduce emissions and future occurrences.
13. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Illinois EPA
Division of Air Pollution Control
Compliance and Enforcement Section (#40)
P.O. Box 19276
Springfield, IL 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Illinois EPA
Division of Air Pollution Control - Regional Office
2009 Mall Street
Collinsville, Illinois 62234

14. An annual report shall be submitted to the Illinois EPA. The report shall summarize VOM emissions and compliance with applicable requirements and shall include:
- a. Annual usage (gallons/year or tons/year) of each VOM and HAP containing material used;
 - b. Material Safety Data Sheets (MSDSs) or other proof of VOM and HAP contents in materials; and
 - c. Annual VOM and HAP emissions (tons/year) with supporting calculations.

Please note the number of roll formers have been decreased from 57 to 54.

If you have any questions on this, please call Randy Solomon at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:RBS:psj

cc: IEPA, FOS Region 3
IEPA, Compliance and Enforcement Section
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the Coil Coating Plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is assumption of 100% evaporation rate of all VOM containing materials and minimum actual control efficiency. The resulting maximum emissions are well below the level, e.g., 100 tons/year for volatile organic materials (VOM), 10 tons/year for a single hazardous air pollutant (HAP), and 25 ton/year for totaled HAPs, at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, and control measures are more effective than required in this permit.

1. Operations and emissions from coil coating operations, including all clean-up operations, shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>Contents (Lb/Gallon)</u>		
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2. Emissions and operation of the bilamination line, including all clean-up operations, shall not exceed the following limits:

<u>Material</u>	<u>Usage and Emissions of Volatile Organic Material</u>		
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